

1 **BOUTIN JONES INC.**  
2 Brian M. Taylor (SBN 214838)  
3 Daniel S. Stouder (SBN 226753)  
4 555 Capitol Mall, Suite 150  
5 Sacramento, CA 95814-4603  
6 Telephone: (916) 321-4444  
7 Facsimile: (916) 441-7597  
8 [btaylor@boutinjones.com](mailto:btaylor@boutinjones.com)  
9 [dstouder@boutinjones.com](mailto:dstouder@boutinjones.com)

10 Attorneys for Plaintiff  
11 Collicutt Energy Services Inc.

12  
13 **UNITED STATES DISTRICT COURT**  
14  
15 **EASTERN DISTRICT OF CALIFORNIA**

16 COLLICUTT ENERGY SERVICES INC., a  
17 Delaware Corporation,

18 Plaintiff,  
19 vs.

20 TRINITY LOGISTICS, INC., a Delaware  
21 Corporation; M & L EXPRESS LLC, a  
22 Maryland Limited Liability Company; PLAY  
23 BOOK CARRIERS INC., an Illinois  
24 Corporation;

25 Defendants.

26  
27 **AND RELATED CROSS-CLAIMS**

28 Case No. 2:22-CV-00364-TLN-CKD

1 **JOINT NOTICE OF TRIAL READINESS**

2 Date Action Filed: 2/24/2022

3  
4 Pursuant to Rule 16 of the Federal Rules of Civil Procedure and the Honorable Troy L.  
5 Nunley's Pretrial Scheduling Order, the parties submit this Joint Notice of Trial Readiness.

6  
7 **Appropriateness of Special Procedures**

8 The parties do not anticipate any motions for bifurcation or other special procedures.

9  
10 **Estimated Trial Length**

11 The parties estimate trial will take 3 days.

12  
13 **Request for Jury**

14 Plaintiff has requested a jury trial.

1                   **Availability for Trial**

2                   Plaintiff's counsel is unavailable for trial on the following dates: 7/17/23-7/21/23, 7/24-  
3 28/23, 8/7-11/23, 9/5-8/23, 9/11-22/23, 11/6-17/23, 12/5-12/23, 12/18-22/23, 1/16-22/24, 2/27/24-  
4 3/6/24, and 10/21/24-11/1/24.

5                   Trinity's counsel is unavailable for trial on the following dates:

6                   M&L's counsel is unavailable for trial on the following dates:

7                   **Settlement Conference**

8                   The parties conducted a mediation on June 14, 2023, with Louis P. Selig but were unable  
9 to reach a resolution. The parties do not think a settlement conference would be fruitful at this  
10 stage.

11  
12                   Plaintiff circulated this Joint Notice of Trial Readiness on Monday, June 26. Defendants  
13 Trinity Logistics, Inc. and M&L Express, LLC indicated they thought the Notice was premature.

14                   Dated: June 28, 2023

**BOUTIN JONES INC.**  
Attorneys at Law

15                   By: /s/ Daniel S. Stouder

Brian M. Taylor  
Daniel S. Stouder

16  
17                   Attorneys for Plaintiff  
18                   Collicutt Energy Services Inc.

19                   Dated:

**Clyde & Co US LLP**  
Attorneys at Law

20                   By: \_\_\_\_\_

21  
22                   Attorneys for Defendant  
23                   Trinity Logistics, Inc.

1 Dated:

**RESNICK & LOUIS, P.C.**  
Attorneys at Law

2

3

By: \_\_\_\_\_

4

Attorneys for Defendant  
M&L Express, LLC

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 *Collicutt v. Trinity, et al.*

2 USDC Eastern District of California Case No.: 2:22-CV-00364-TLN-CKD

3  
**PROOF OF SERVICE**  
**[CCP §1013a]**

4 The undersigned declares:

5 I am employed in the County of Sacramento, State of California. I am over the age of 18  
6 years and not a party to the within action; I am employed by Boutin Jones Inc., 555 Capitol Mall,  
7 Suite 1500, Sacramento, California 95814.

8 On the date set forth below, I served the foregoing document(s) described as:

9  
**JOINT NOTICE OF TRIAL READINESS**

10  **by Notice Of Electronic Filing (NEF):** service of the document(s) was effective on the  
11 following persons whom are registered participants of the Court's CM/ECF system,  
12 consented to electronic service, and received an electronic copy of the document(s) by the  
13 Clerk of the Court via Notice of Electronic Filing.

14 addressed to the person(s) on whom it is to be served, whose name(s) and address(es) are listed below:

15 Conte Cicala  
16 Clyde & Co US LLP  
17 150 California Street, 15th Floor  
18 San Francisco, CA 94111 | USA  
19 O: 415 365 9800  
20 F: 415 365 9801  
[Conte.Cicala@clydeco.us](mailto:Conte.Cicala@clydeco.us)

**Counsel for Defendant**  
**TRINITY LOGISTICS, INC.**

21 Thomas M. Fedeli  
22 Clyde & Co US LLP  
23 355 S. Grand Ave., Suite 1400,  
24 Los Angeles, CA 90071  
25 T: (213) 358-7674  
F: (213) 358-7650  
[Thomas.Fedeli@clydeco.us](mailto:Thomas.Fedeli@clydeco.us)

**Counsel for Defendant**  
**M & L EXPRESS LLC**

26 Robert A. Hufnagel  
27 Angela C. Allard  
28 RESNICK & LOUIS, P.C.  
3350 Shelby Street, Suite 200  
Ontario, CA 91764  
Tel/Fax: (909) 906-1277  
[rhufnagel@rlattorneys.com](mailto:rhufnagel@rlattorneys.com)  
[aallard@rlattorneys.com](mailto:aallard@rlattorneys.com)  
[lbremmer@rlattorneys.com](mailto:lbremmer@rlattorneys.com) (staff)

1 PLAY BOOK CARRIERS INC.,  
2 an Illinois Corporation  
3 Sarvar Shugayev  
4 1144 McClurg Dr  
5 Batavia , IL 60510

**Defendant**  
*Not Served.*  
*Default entered against Defendant.*

6  
7 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
8 true and correct. Executed on June 28, 2023 at Sacramento, California.  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

10 /s/ Madeline Enmark

11 

---

MADELINE ENMARK